

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

INTERNATIONAL REFUGEE ASSISTANCE
PROJECT, INC.,

Plaintiff,

-v-

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendant.

No. 20 Civ. 4284 (RWL)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Terri White executed on January 22, 2021, and all exhibits attached thereto, the Declaration of Hilary E. Ingraham executed on January 22, 2021, and the Declaration of Eric F. Stein executed on January 22, 2021, and all exhibits attached thereto, defendant United States Citizenship and Immigration Services (“USCIS”), by its attorney, Audrey Strauss, United States Attorney for the Southern District of New York, hereby moves this Court for an Order pursuant to Federal Rule of Civil Procedure 12(b)(1) dismissing the complaint with prejudice, and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to a prior Order of the Court (Dkt. No. 27), Plaintiff’s opposition and any cross-motion shall be filed on or before March 3, 2021, USCIS’s reply and opposition to any cross-motion shall be filed on or before March 24, 2021, and Plaintiff’s reply in support of any cross-motion shall be filed on or before April 14, 2021.

Dated: January 22, 2021
New York, New York

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

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